

Michael Rubin (SBN 80618)
Matthew Murray (SBN 271461)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: mrubin@altber.com
mmurray@altber.com

Cliff Palefsky (SBN 77683)
Keith Ehrman (SBN 106985)
MCGUINN, HILLSMAN & PALEFSKY
535 Pacific Avenue
San Francisco, CA 94133
Telephone: (415) 421-9292
Facsimile: (415) 403-0202
Email: cp@mhpsf.com
keith@mhpsf.com

William B. Reilly (SBN 177550)
LAW OFFICE OF WILLIAM REILLY
86 Molino Avenue
Mill Valley, CA 94941
Telephone: (415) 225-6215
Facsimile: (415) 634-2897
Email: bill@williambreilly.com

Attorneys for Plaintiffs
(Counsel for Defendants listed on the next page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PETER SCHUMAN, an individual, and
WILLIAM COPLIN, an individual, on behalf
of themselves and on behalf of others
similarly situated,

Plaintiffs,

v.

MICROCHIP TECHNOLOGY
INCORPORATED, a corporation; ATMEL
CORPORATION, a corporation; and ATMEL
CORPORATION U.S. SEVERANCE
GUARANTEE BENEFIT PROGRAM, an
employee benefit plan,

Defendants.

Case No. 4:16-CV-05544-HSG

CLASS ACTION

**LOCAL RULE 6-2 STIPULATION AND
ORDER TO REVISE BRIEFING AND
HEARING SCHEDULE ON DEFENDANTS'
MOTION TO DECERTIFY CLASS (as
modified)**

(Current) Hearing Date: December 18, 2025 at
2:00 p.m.

1 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C., SBN 00504800
Mark G. Kisicki, Esq. (CA SBN 150057)

2 mark.kisicki@ogletreedeakins.com

Elizabeth M. Soveranez (AZ SBN 024009) admitted pro hac vice

3 elizabeth.soveranez@ogletreedeakins.com

Esplanade Center III, Suite 800

4 2415 East Camelback Road

Phoenix, AZ 85016

5 Tel.: 602.778.3700

Fax: 602.778.3750

6 Mark Schmidtke (IN SBN 1733-45) admitted pro hac vice

7 56 S. Washington Street, Suite 302

Valparaiso, IN 46383

8 Tel.: 219.242.8668

Fax: 219.242.8669

9 mark.schmidtke@ogletreedeakins.com

10 Erika L. Leonard (GA SBN 565965) admitted pro hac vice

301 Congress Avenue, Suite 1150

11 Austin, TX 78701

Tel.: 512.344.4700

12 Fax: 512.344.4701

erika.leonard@ogletree.com

13 *Attorneys for Defendants*

**STIPULATION TO REVISE BRIEFING AND HEARING SCHEDULE
ON DEFENDANTS' MOTION TO DECERTIFY CLASS**

The parties hereby stipulate and jointly ask the Court to order the following revised schedule for briefing and hearing on Defendants' recently filed Motion to Decertify Class (ECF 218):

- Plaintiffs' Opposition to the Motion to Decertify the Class shall be due December 19, 2025;
- Defendants' Reply shall be due January 9, 2026;
- The hearing on Defendants' Motion to Decertify the Class shall be reset to January 22, 2026. Counsel arguing the motion shall appear in person, while other counsel may appear remotely.

Pursuant to Local Rule 6-2, in support of this stipulated change in deadlines, the parties state as follows:

On November 13, 2025, Defendants filed a Motion to Decertify Class and noticed it for the next available hearing date on the Court's calendar, December 18, 2025. ECF 218. Under the default schedule for noticed motions, Plaintiffs' opposition would be due on Friday, November 28, 2025, the day after Thanksgiving. ECF 218; LR 7-3(a).

Plaintiffs' counsel have pre-scheduled travel and time out of the office the full week of Thanksgiving. They also have many other pressing deadlines in this and other cases in the coming weeks, including a December 8, 2025 deadline to respond to Defendants' petition for writ of certiorari to the Supreme Court in this case. These holiday plans and other deadlines together made it infeasible for counsel to prepare and file an opposition to the motion to decertify by the day after Thanksgiving, and Plaintiffs' counsel therefore reached out to counsel for Defendants to propose a stipulation to extend their opposition deadline by three weeks, to December 19, 2025, to allow adequate time to prepare a response.

Defendants agreed to Plaintiffs' request and requested in turn that, given the winter holidays, their reply deadline be extended to January 9, 2026. Plaintiffs have agreed.

To account for this revised briefing schedule, and subject to the Court's approval, the parties have agreed to reset the hearing on Defendants' Motion to Decertify to January 22, 2026.

1 Counsel arguing the motion are available to attend in person. At least one counsel from Defendants
 2 who will not be arguing the motion requests permission to attend remotely, given scheduling and
 3 travel constraints.

4 The parties have previously stipulated and filed unopposed motions to modify various
 5 briefing schedules in this case. ECF 20, 21, 36, 37, 78, 79, 141, 142. There have been no prior
 6 modifications of the briefing schedule for Defendants' Motion to Decertify.

7 The stipulated revision to the briefing and hearing schedule will not otherwise affect the
 8 schedule in this case, as the trial has not yet been set.

9 Dated: November 17, 2025

Respectfully submitted,

10 **ALTSHULER BERZON LLP**
 11 MICHAEL RUBIN
 MATTHEW J. MURRAY

12 **MCGUINN, HILLSMAN & PALEFSKY**
 13 CLIFF PALEFSKY
 KEITH EHRMAN

14 **LAW OFFICE OF WILLIAM REILLY**
 15 WILLIAM REILLY

16 By: /s/ Michael Rubin

17 Michael Rubin
 Attorneys for Plaintiffs

18
 19 **OGLETREE, DEAKINS, NASH,
 SMOAK & STEWART, P.C.**

20 By: /s/ Mark G. Kisicki (with permission)

21 Mark G. Kisicki
 Elizabeth M. Soveranez
 2415 East Camelback Road, Suite 800
 22 Phoenix, AZ 85016

23 Mark Schmidtke
 56 S. Washington Street, Suite 302
 24 Valparaiso, IN 46383

25 Erika L. Leonard
 301 Congress Avenue, Suite 1150
 26 Austin, TX 78701

27 Attorneys for Defendants
 28

Local Rule 5-1(i)(3) E-Signature Attestation

I attest that each of the other Signatories have concurred in the filing of this document.


/s/ Michael Rubin

Michael Rubin

Order

PURSUANT TO STIPULATION, IT IS SO ORDERED. Counsel who will not argue the motion may appear remotely via Public Zoom Webinar. Counsel may access the webinar information at <https://www.cand.uscourts.gov/hsg>.

Date: 11/18/2025


THE HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Court Judge
Northern District of California